

# **EXHIBIT 28**

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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CIV. NO. 18-2301 (JRT/KMM)

David W. Lynas, as Trustee for the  
next-of-kin of James C. Lynas,

Plaintiff,

vs.

Linda S. Stang, et al.,

Defendants.  
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VIDEO DEPOSITION TRANSCRIPT OF

JENNIE THOMPSON

May 30, 2019

at

Caribou Coffee, St. Cloud West  
4135 West Division Street  
St. Cloud, MN 56301

Reporter: Jane T. Doby  
Registered Merit Reporter  
Doby Professional Reporting, Inc.  
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Jennie Thompson  
5/30/2019

<p style="text-align: right;">2</p> <p>1 APPEARANCES: 2 On Behalf of Plaintiff David W. Lynas: 3 Robert Bennett, Attorney at Law 4 rbennett@gaskinsbennett.com 5 Kathryn H. Bennett, Attorney at Law 6 kbennett@gaskinsbennett.com 7 GASKINS, BENNETT &amp; BIRRELL, LLP 8 333 South Seventh Street 9 Suite 3000 10 Minneapolis, MN 55402 11 12 On Behalf of the Sherburne County Defendants: 13 14 Jason M. Hiveley, Attorney at Law 15 jasonh@irc-law.com 16 IVERSON REUVERS CONDON 17 9321 Ensign Avenue South 18 Bloomington, MN 55438 19 20 On Behalf of MENd Defendants: 21 22 Carolin J. Nearing, Attorney at Law 23 cnearing@larsenking.com 24 LARSON KING, LLP 25 30 East Seventh Street Suite 2800 St. Paul, MN 55101  Also Present: Jayme Hogan, Envision Video  NOTE: Pursuant to Minnesota Rule of Civil Procedure 30.06, the original transcript will be delivered to Gaskins, Bennett &amp; Birrell, LLP, the noticing party. NOTE: No exhibits were marked for identification.</p>	<p style="text-align: right;">4</p> <p style="text-align: center;">EXAMINATION</p> <p>1 2 BY MS. BENNETT: 3 Q My name is Kathryn Bennett. And I we just 4 met, but I represent the plaintiff in this matter. 5 And I'm going to be asking you some questions today. 6 Have you ever had your deposition taken 7 before? 8 A No. 9 Q All right. Just a few ground rules to make 10 it go a little smoother for the court reporter. 11 Let me finish my question before you 12 answer, and I'll try to give you the same courtesy. 13 Sound okay? 14 A Uh-huh. Yes. 15 Q And then also, answer using the English 16 language. Not uh-huhs, uh-uh, or head nods, so that 17 the court reporter -- 18 A Okay. 19 Q -- can take down. All right. 20 Where did you go to high school? 21 A Coon Rapids Senior High. 22 Q And did you graduate from Coon Rapids? 23 A Yes. 24 Q When? 25 A 1990.</p>
<p style="text-align: right;">3</p> <p style="text-align: center;">PROCEEDINGS</p> <p>1 2 (The video deposition of JENNIE THOMPSON 3 was commenced at 11:23 a.m. as follows:) 4 JENNIE THOMPSON 5 called as a witness, being first duly sworn, was 6 examined and testified as follows: 7 *** 8 VIDEOGRAPHER: This is the video deposition 9 of Jennie Thompson. Today's date is May 30th, 2019. 10 The time is approximately 11:23 a.m. 11 Would each attorney please state their 12 name, for the record. 13 MS. BENNETT: Kathryn Bennett, for the 14 plaintiff. 15 MR. BENNETT: Bob Bennett, for the 16 plaintiff. 17 MS. NEARING: Carrie Nearing, for the MENd 18 Defendants. 19 MR. HIVELEY: Jason Hiveley, for the 20 Sherburne County Defendants. 21 VIDEOGRAPHER: Thank you. 22 Would the court reporter please administer 23 the oath. 24 (Oath administered.) 25 THE WITNESS: I do.</p>	<p style="text-align: right;">5</p> <p>1 Q And where do you currently live? 2 A Zimmerman. 3 Q Did you receive any post-high school 4 education? 5 A Yes. 6 Q Can you walk us through that, please? 7 A I went to Anoka-Ramsey Technical College 8 and got my CMA right after high school. And then I 9 was a CMA for ten years. 10 Took ten years off. Became a stay-at-home 11 mom and went to nursing school at that time. 12 And then became an RN in 2008. 13 Q And where did you work as a CMA? 14 A Camden Physicians in Maple Grove. 15 Q And what were your job duties there? 16 A Rooming patients, vital signs, labs. 17 Q Anything to do with mental health there? 18 A No. 19 Q And where did you obtain your RN degree? 20 A Anoka-Ramsey Community College. 21 Q In 2008, you said? 22 A Yes. 23 Q And it looks like you obtained your license 24 in July of 2008. Does that sound right? 25 A Yes.</p>

<p style="text-align: right;">6</p> <p>1 Q Do you have any restrictions?</p> <p>2 <b>A No.</b></p> <p>3 Q Have you ever been involved in any</p> <p>4 disciplinary hearings?</p> <p>5 <b>A No.</b></p> <p>6 Q And after obtaining your nursing degree,</p> <p>7 can you walk us through where you've worked since</p> <p>8 then?</p> <p>9 <b>A The only place that I worked is Sherburne</b></p> <p>10 <b>County Jail.</b></p> <p>11 Q Did you work as an employee of Sherburne</p> <p>12 County?</p> <p>13 <b>A Correct.</b></p> <p>14 Q And what years was that?</p> <p>15 <b>A Until MENd took over. From 2008 until MENd</b></p> <p>16 <b>took over, but I can't remember what year that was.</b></p> <p>17 Q And were you absorbed by MENd and offered</p> <p>18 the same position --</p> <p>19 <b>A Yes. Yes.</b></p> <p>20 MS. NEARING: Make sure to let her finish</p> <p>21 her question.</p> <p>22 THE WITNESS: Oh. Sorry.</p> <p>23 BY MS. BENNETT:</p> <p>24 Q And what position were you working in at</p> <p>25 Sherburne County under Sherburne County?</p>	<p style="text-align: right;">8</p> <p>1 Q And where was that?</p> <p>2 <b>A Five East at Mercy Hospital.</b></p> <p>3 Q And how long was that rotation?</p> <p>4 <b>A I believe it was a semester of school.</b></p> <p>5 Q And was that all inpatient care, or can you</p> <p>6 describe --</p> <p>7 <b>A Yes. It was inpatient care.</b></p> <p>8 Q And did you have any education or training</p> <p>9 through nursing school in detoxification and</p> <p>10 withdrawal care?</p> <p>11 <b>A No.</b></p> <p>12 Q What about correctional medicine?</p> <p>13 <b>A No.</b></p> <p>14 Q And during your rotation at Mercy, were you</p> <p>15 doing suicide risk assessments?</p> <p>16 <b>A No.</b></p> <p>17 Q Did you do mental health assessments?</p> <p>18 <b>A It was more patient care.</b></p> <p>19 Q What do you mean by that?</p> <p>20 <b>A Their mood for the day. If they're going</b></p> <p>21 <b>out and being in the community -- well, they call it</b></p> <p>22 <b>the community. As far as, like, interacting with</b></p> <p>23 <b>other individuals, going to therapies.</b></p> <p>24 Q And have you had or obtained any</p> <p>25 certificates?</p>
<p style="text-align: right;">7</p> <p>1 <b>A An RN.</b></p> <p>2 Q And then that was the same position that</p> <p>3 you were hired on by MENd?</p> <p>4 <b>A Correct.</b></p> <p>5 Q And at some point did you become a</p> <p>6 supervisor?</p> <p>7 <b>A Yes.</b></p> <p>8 Q When was that?</p> <p>9 <b>A I can't remember the date. I know it was</b></p> <p>10 <b>in December.</b></p> <p>11 Q Do you know what year?</p> <p>12 <b>A I think it was December, two years ago.</b></p> <p>13 <b>Possibly.</b></p> <p>14 Q So 2017?</p> <p>15 <b>A No. I think it was before that. 2016,</b></p> <p>16 <b>maybe.</b></p> <p>17 Q And that's just your best guess?</p> <p>18 <b>A That's my best guess. Yes.</b></p> <p>19 Q And throughout your nursing education, can</p> <p>20 you describe your experience with mental health?</p> <p>21 <b>A We see patients and evaluate them using</b></p> <p>22 <b>different tools.</b></p> <p>23 Q Did you have any rotation in psychiatry or</p> <p>24 any mental health --</p> <p>25 <b>A I did. Through nursing school.</b></p>	<p style="text-align: right;">9</p> <p>1 <b>A No.</b></p> <p>2 Q And you're not a public health nurse. Are</p> <p>3 you?</p> <p>4 <b>A I have to take that back. Yes. CCHP.</b></p> <p>5 <b>Correctional -- I can't ever remember the name.</b></p> <p>6 <b>Correctional Health Care --</b></p> <p>7 Q And --</p> <p>8 <b>A -- something.</b></p> <p>9 Q Sorry.</p> <p>10 <b>A That's okay.</b></p> <p>11 Q Was it the advanced CCHP certification or a</p> <p>12 specialty certification?</p> <p>13 <b>A No.</b></p> <p>14 Q Just the regular one?</p> <p>15 <b>A Yep.</b></p> <p>16 Q And you're not a public health nurse. Are</p> <p>17 you?</p> <p>18 <b>A No.</b></p> <p>19 Q And you're not an advanced practice</p> <p>20 registered nurse?</p> <p>21 <b>A No.</b></p> <p>22 Q And you're not a qualified mental health</p> <p>23 professional. Are you?</p> <p>24 <b>A Correct.</b></p> <p>25 Q And then did you know anything about MENd</p>

<p style="text-align: right;">10</p> <p>1 prior to you being hired on in -- I guess you don't</p> <p>2 know exactly when that happened.</p> <p>3 <b>A No.</b></p> <p>4 <b>Not of MEnD. But I worked -- Dr. Leonard</b></p> <p>5 <b>started at Sherburne County. And when I started at</b></p> <p>6 <b>Sherburne County he was the doctor there. So I did</b></p> <p>7 <b>know Dr. Leonard. But nothing with MEnD.</b></p> <p>8 Q And did Dr. Leonard leave and then come</p> <p>9 back into Sherburne County with his company, MEnD?</p> <p>10 <b>A Correct.</b></p> <p>11 Q Did you always see yourself in correctional</p> <p>12 medicine? Is that what you wanted to do?</p> <p>13 <b>A After graduation, I had no idea what I</b></p> <p>14 <b>wanted to do.</b></p> <p>15 Q How was it that you ended up at Sherburne</p> <p>16 County Jail?</p> <p>17 <b>A My sister recommended that I apply to an RN</b></p> <p>18 <b>job that was in Washington County, because she</b></p> <p>19 <b>thought I would like it. And I said that was too far</b></p> <p>20 <b>to drive from Zimmerman.</b></p> <p>21 <b>And then, like, two weeks later there was</b></p> <p>22 <b>an opening at Sherburne. So I applied there, and</b></p> <p>23 <b>that's where I started working.</b></p> <p>24 Q And it was a better fit for driving-wise</p> <p>25 and all of that for you?</p>	<p style="text-align: right;">12</p> <p>1 Q And these meetings with staff, are those a</p> <p>2 regularly scheduled meeting?</p> <p>3 <b>A No.</b></p> <p>4 Q So it's not like every Monday morning you</p> <p>5 have a meeting with the staff. Is that --</p> <p>6 <b>A No.</b></p> <p>7 Q Are you still part of the team that</p> <p>8 coordinates the care for the inmates of the</p> <p>9 supervisory nurse?</p> <p>10 <b>A What do you mean, "coordinate care"?</b></p> <p>11 Q So are you assessing patients still, in</p> <p>12 your role as a supervisory nurse?</p> <p>13 <b>A Yes.</b></p> <p>14 Q So you're seeing them and evaluating</p> <p>15 inmates?</p> <p>16 <b>A Yes. Yes.</b></p> <p>17 Q And then, I take it, you're probably</p> <p>18 talking and collaborating with other MEnD providers,</p> <p>19 both RNs and medical providers?</p> <p>20 <b>A Correct.</b></p> <p>21 Q Are you still with MEnD Correctional Care?</p> <p>22 <b>A Yes.</b></p> <p>23 Q And when MEnD took over the health care at</p> <p>24 Sherburne County, did everyone get hired on?</p> <p>25 <b>A Everyone was offered a position, but not</b></p>
<p style="text-align: right;">11</p> <p>1 <b>A It was a better fit for driving-wise.</b></p> <p>2 <b>Yeah.</b></p> <p>3 Q And what is your current title with MEnD?</p> <p>4 <b>A Supervisory nurse.</b></p> <p>5 Q And did you hold that position in November</p> <p>6 of 2017?</p> <p>7 <b>A Possibly. I think it was 2016 when I</b></p> <p>8 <b>became the nursing supervisor.</b></p> <p>9 Q Is that a full-time, salaried position?</p> <p>10 <b>A Yes.</b></p> <p>11 Q How many hours do you work per week in that</p> <p>12 position?</p> <p>13 <b>A Well, we work 12-hour shifts. So it</b></p> <p>14 <b>varies.</b></p> <p>15 Q And you're only at Sherburne County Jail?</p> <p>16 <b>A Correct.</b></p> <p>17 Q How is the supervisory nurse different than</p> <p>18 a regular RN, with MEnD?</p> <p>19 <b>A I am responsible for holding meetings with</b></p> <p>20 <b>the staff; bringing up new and current issues;</b></p> <p>21 <b>guidance, as far as charting.</b></p> <p>22 Q And by "new and current issues," what did</p> <p>23 you mean by that?</p> <p>24 <b>A Like, if there's a new way that they want</b></p> <p>25 <b>to handle how something is being done.</b></p>	<p style="text-align: right;">13</p> <p>1 <b>all accepted.</b></p> <p>2 Q And when MEnD took over, who became the</p> <p>3 medical director at Sherburne County Jail?</p> <p>4 <b>A The medical director?</b></p> <p>5 Q Yes.</p> <p>6 <b>A Dr. Leonard.</b></p> <p>7 Q And who was the medical provider in the</p> <p>8 jail?</p> <p>9 <b>A I cannot remember who it was. We've had a</b></p> <p>10 <b>couple of different ones.</b></p> <p>11 Q Do you recall Crystal Waagmeester?</p> <p>12 <b>A I never worked directly with her.</b></p> <p>13 Q Does that mean you may have interacted with</p> <p>14 her, but was it while she was on call?</p> <p>15 <b>A On the phone. Yeah. She was never at our</b></p> <p>16 <b>site as a provider.</b></p> <p>17 Q And you just don't remember the providers</p> <p>18 that have worked there?</p> <p>19 <b>A We've had a couple. Yeah, I don't.</b></p> <p>20 Q You don't know who was there in November of</p> <p>21 2017, and as you sit here today?</p> <p>22 <b>A I don't -- who -- no, I don't.</b></p> <p>23 Q Who was the mental health provider in</p> <p>24 November of 2017?</p> <p>25 <b>A Michael Robertson.</b></p>

<p style="text-align: right;">14</p> <p>1           <b>Janell Hussein, I think, was the provider</b> 2 <b>at the time. If I'm remembering --</b> 3           MR. BENNETT: Medical provider? 4           THE WITNESS: The medical provider. Yeah. 5 BY MS. BENNETT: 6           Q And who was the nursing director? 7           <b>A Diana VanDerBeek.</b> 8           Q And how many people are under you as the 9 nursing supervisor? 10          <b>A Seven RNs, and then health techs.</b> 11          Q And they report directly to you? 12          <b>A The health -- the nurses do. The health</b> 13 <b>techs, they have a lead shift supervisor that they</b> 14 <b>report to. But they can also report to me.</b> 15          Q And who does the med pass? 16          <b>A The health techs. RNs occasionally help.</b> 17          Q And was there any -- anyone from Sherburne 18 County that provided medical care in November of 19 2017, or had that all switched to MEnD? 20          <b>A That had all switched to MEnD.</b> 21          Q As the nursing supervisor, are you familiar 22 with the MEnD policies? 23          <b>A Yes.</b> 24          Q Do you receive training on that yearly? 25          <b>A I -- on the policies, specifically?</b></p>	<p style="text-align: right;">16</p> <p>1           Q Can you describe the suicide prevention 2 plan under MEnD? 3           <b>A I'd have to see the -- I'd have to look</b> 4 <b>directly at the paperwork.</b> 5           Q So as you sit here today, you couldn't walk 6 through any of the protocols or anything? 7           <b>A I could, but I don't want to miss a step.</b> 8           Q Do you typically refer back to the 9 procedures and policies when you're dealing with 10 someone with mental illness? 11          <b>A Occasionally.</b> 12          Q What -- Exhibit 21. 13 Is that the suicide prevention plan? 14          <b>A Uh-huh. Yes.</b> 15          Q And under that, any risk -- or any 16 perceived risk is to be treated as a valid threat. 17 Correct? 18          <b>A Correct.</b> 19          Q And then under the protocol for mental 20 health evaluations. Does each inmate that comes into 21 the Sherburne County Jail receive a suicide risk 22 assessment? 23          <b>A No.</b> 24          Q When are those performed? 25          <b>A During the health assessment. Unless we</b></p>
<p style="text-align: right;">15</p> <p>1           Q Yeah. 2           <b>A No.</b> 3           Q What is the yearly training for? 4           <b>A There's several different, and I can't -- I</b> 5 <b>would have to see the training packets. I know we</b> 6 <b>get a review of the policies and procedures every</b> 7 <b>year that we review and sign off on. But there's no,</b> 8 <b>like, specific training for it.</b> 9           Q And who leads the training by MEnD? 10          <b>A Todd Anderson.</b> 11          Q What's his position? 12          <b>A Nursing director for -- what is that.</b> 13 <b>Training. Training nursing director.</b> 14          Q And he's with MEnD? 15          <b>A Yes.</b> 16          Q Is the goal under MEnD's policy to provide 17 quality medical care to inmates from the time of 18 their admission to the time of their discharge? 19          <b>A Yes.</b> 20          Q And that would include evaluating inmates 21 for emotional and mental stability? 22          <b>A Yes.</b> 23          Q And you're attempting to discover any 24 mental illness as well. Correct? 25          <b>A Correct.</b></p>	<p style="text-align: right;">17</p> <p>1           <b>believe that it needs to be done sooner. It's kind</b> 2 <b>of a judgment.</b> 3           Q Does every inmate receive a full health 4 assessment? 5           <b>A No.</b> 6           Q Who, which inmates, would receive that? 7           <b>A Anyone that's there longer than 14 days.</b> 8           Q And if they were not there longer than 14 9 days, but still had a full health assessment, what 10 would that mean to you? 11          <b>A That they have more underlying factors;</b> 12 <b>either medical or mental health issues.</b> 13          Q So a full health assessment may be 14 initiated early if someone is exhibiting anxiety or 15 depression? 16          <b>A Correct.</b> 17          Q What about for chemical withdrawal issues? 18          <b>A Not necessarily.</b> 19          Q So more likely, if it's initiated before 20 that 14-day period, it's due to mental health issues? 21          <b>A Mental health or medical issues.</b> 22          Q And medical might be an ongoing chronic 23 illness or something like that? 24          <b>A Correct.</b> 25          Q Diabetes or something?</p>

<p style="text-align: right;">18</p> <p>1       <b>A Congestive heart failure. Yeah. If</b> 2 <b>they're on a lot of meds.</b> 3       Q And as a jail nurse with MEnD, you're 4 trained how to use the forms, protocols and policies? 5       <b>A Correct.</b> 6       Q And are the nurses the people from MEnD who 7 are really interacting with the inmates or patients 8 on a more frequent basis? 9       <b>A Yes. We see them and triage them.</b> 10      Q And would that be more than a medical 11 provider? 12      MS. NEARING: Objection. Calls for 13 speculation. 14      <b>A Yes.</b> 15 BY MS. BENNETT: 16      Q And more than the mental health provider? 17      <b>A Yes.</b> 18      Q So you're kind of the boots on the ground 19 in the jail for MEnD. Is that fair? 20      <b>A Yes.</b> 21      Q And do you review information obtained 22 by -- as a nurse, review information obtained by 23 correctional officers? 24      <b>A Occasionally.</b> 25      Q And when would that be done?</p>	<p style="text-align: right;">20</p> <p>1 with substance abuse issues? 2       <b>A Yes.</b> 3       Q And have you seen patients go through 4 withdrawal? 5       <b>A Yes.</b> 6       Q Is it a painful thing to go through? 7       MS. NEARING: Objection. Foundation. 8       <b>A Pain is subjective to every individual.</b> 9 <b>So...</b> 10 BY MS. BENNETT: 11      Q Have you witnessed people that you know are 12 in withdrawal that are in pain? 13      <b>A Yes.</b> 14      Q Have you been taught, through your 15 education and training as a nurse, that withdrawal 16 can be a painful thing to go through? 17      <b>A Yes.</b> 18      Q And that's something that needs to be -- or 19 can be treated by MEnD staff for the inmates who are 20 going through that? 21      <b>A Yes.</b> 22      Q Do you see inmates who come and who have 23 been self-medicating for mental health issues? 24      <b>A Yes.</b> 25      Q Is that frequently seen in the jail</p>
<p style="text-align: right;">19</p> <p>1       <b>A Depending on the situation.</b> 2       Q Under what circumstances do you know that 3 to have been done? 4       <b>A If a patient's been on a mental health</b> 5 <b>watch; if they're reporting pain and we put them on</b> 6 <b>an activity watch; if they're eating; if they're not</b> 7 <b>eating, a food and liquid watch.</b> 8       Q As nurses, are you constantly monitoring 9 symptoms that have been expressed by inmates, both 10 medically or mental health-wise? 11      <b>A Yes.</b> 12      Q Because those symptoms can change over 13 time. Right? 14      <b>A Correct.</b> 15      Q And in order to provide the quality care 16 that's the goal of MEnD, you need to be monitoring 17 them throughout their stay at the jail. Is that 18 fair? 19      <b>A Yes.</b> 20      Q And would that include substance abuse 21 issues and withdrawal issues? 22      <b>A Correct.</b> 23      Q And mental health issues? 24      <b>A Correct.</b> 25      Q Do you see a large percentage of inmates</p>	<p style="text-align: right;">21</p> <p>1 setting? 2       <b>A Yes.</b> 3       Q And one portion of an inmate's health that 4 you'd want to pay attention to would be mental health 5 instability and mental illness. Correct? 6       <b>A Right.</b> 7       Q And do you see lot of that in the jail 8 setting as well? 9       <b>A Occasionally.</b> 10      Q And under -- well, at Sherburne County 11 Jail, does -- do the MEnD people work with the 12 Sherburne County jailers and jail staff in order to 13 observe inmates and do work together? 14      <b>A Yes.</b> 15      Q And why is that important? 16      <b>A The correctional officers are our eyes and</b> 17 <b>ears out in the housing units.</b> 18      Q And how is it that information is exchanged 19 between MEnD personnel and the county personnel? 20      <b>A Phone calls, logging in their ProPhoenix</b> 21 <b>and Guardian systems.</b> 22      Q And what are those? 23      <b>A ProPhoenix and Guardian are where the</b> 24 <b>individuals are, where they're housed, and no</b> 25 <b>contacts and such.</b></p>

<p style="text-align: right;">22</p> <p>1 Q And then are they -- do you have their 2 emails and -- email addresses too? 3 <b>A For the officers?</b> 4 Q For county employees. 5 <b>A We have -- yeah. Yes.</b> 6 Q So if someone is on a mental health watch, 7 would that be something that's conveyed to both MEnD 8 personnel and county personnel? 9 <b>A If someone is on a mental health watch?</b> 10 Q Yes. 11 <b>A Yes. Yes.</b> 12 Q And can that be done by email? 13 <b>A We email the sergeants, and then they</b> 14 <b>distribute it out. And then we call the housing</b> 15 <b>units and let them know who's on the watch.</b> 16 Q So you get it the county personnel that can 17 then disseminate it to those correctional officers -- 18 <b>A Uh-huh.</b> 19 Q -- who would need to know? 20 <b>A Correct.</b> 21 Q And with regard to the detoxification 22 protocol with MEnD, it's my understanding, and 23 correct me if I'm wrong, that first a urine test is 24 done? 25 <b>A Correct.</b></p>	<p style="text-align: right;">24</p> <p>1 Q It's only if indicated? 2 <b>A Only if indicated, and if they are in the</b> 3 <b>Kevlar gown in booking.</b> 4 Q And what would indicate that those need to 5 be continued? So that if -- 6 <b>A If they're in a Kevlar gown and they're in</b> 7 <b>booking, and they're on, like, a 15-minute mental</b> 8 <b>health watch.</b> 9 Q So if there's an altered mental status, 10 would that be one reason as well? 11 <b>A Possibly.</b> 12 Q I'll show you Exhibit 20. 13 Those are three suicide risk screening 14 forms for James Lynas from November of 2017. 15 Do you see that? 16 <b>A Yes.</b> 17 Q And at the top of those forms, it looks 18 like there's a few indications for screening. Do you 19 see those? 20 <b>A Yes.</b> 21 Q And some of those include an abnormal 22 health assessment screen. Do you see that? 23 <b>A Yes.</b> 24 Q And then the BDI score of greater than 40? 25 Is that right?</p>
<p style="text-align: right;">23</p> <p>1 Q And then a chemical withdrawal 2 questionnaire is gone through with the inmate? 3 <b>A Uh-huh. Correct.</b> 4 Q And then, if indicated, a chemical 5 withdrawal flow sheet will be started. And then 6 they'll be checked in on every day until the scores 7 allow nursing staff to stop checking in on them? 8 <b>A Correct.</b> 9 Q And then with regard to the suicide 10 precaution plan, if a suicide risk assessment is 11 given, they're not -- they're not each given one. 12 Correct? Each inmate does not automatically receive 13 a suicide risk assessment? 14 <b>A They do at their health assessment.</b> 15 Q And that's if they're there for longer than 16 14 days? 17 <b>A Yes.</b> 18 Q Or if otherwise indicated? 19 <b>A Yes.</b> 20 Q And then those risk assessment forms are 21 not automatically continued. Correct? 22 <b>A Risk assessment forms.</b> 23 Q The suicide risk assessment forms? They 24 don't just automatically keep happening each day? 25 <b>A No.</b></p>	<p style="text-align: right;">25</p> <p>1 <b>A Yes.</b> 2 Q And that -- the "BDI" means Beck Depression 3 Inventory. Correct? 4 <b>A Correct.</b> 5 Q And why are those used? 6 <b>A To screen for their thoughts of suicide.</b> 7 Q And are they an important indicator to you 8 as a nurse of MEnD? 9 <b>A They can be.</b> 10 Q And that's one indicator for a suicide risk 11 screening form to be used by MEnD. Correct? 12 <b>A For what?</b> 13 Q A BDI score of greater than 40. 14 <b>A Yes.</b> 15 Q Is an individual that's experiencing both 16 painful withdrawal symptoms and mental health issues 17 put on both of those protocols? A withdrawal 18 protocol and a -- the suicide prevention plan 19 protocol? 20 <b>A Possibly.</b> 21 Q Do you know if that was true for James 22 Lynas? 23 <b>A I do not know.</b> 24 Q And we're here today because of the suicide 25 of James Lynas that occurred on November 9th, 2017,</p>

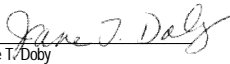



<p style="text-align: right;">26</p> <p>1 at the jail. Do you understand that?</p> <p>2 <b>A Yes.</b></p> <p>3 Q Did you have any interaction with James</p> <p>4 Lynas prior to November of 2017?</p> <p>5 <b>A Prior to November of 2017?</b></p> <p>6 Q Yes.</p> <p>7 <b>A Possibly.</b></p> <p>8 Q As you sit here today, do you recall any of</p> <p>9 those possible prior interactions?</p> <p>10 <b>A Nope. No.</b></p> <p>11 Q Showing you Exhibit 25. And that's a</p> <p>12 November 2017 flow sheet for James Lynas. Correct?</p> <p>13 <b>A Correct.</b></p> <p>14 Q And your writing appears on that form.</p> <p>15 Correct?</p> <p>16 <b>A Correct.</b></p> <p>17 Q And can you read through your first note</p> <p>18 for James Lynas?</p> <p>19 <b>A 11/2/17. Reports nausea and diarrhea.</b></p> <p>20 <b>Reports being able to keep -- eat and keep down</b></p> <p>21 <b>dinner last night. No -- no reporting. Only slept</b></p> <p>22 <b>two hours last night. Will recheck him tomorrow.</b></p> <p>23 Q And then what score did he receive?</p> <p>24 <b>A A --</b></p> <p>25 Q From you.</p>	<p style="text-align: right;">28</p> <p>1 either of those days that you saw James Lynas?</p> <p>2 <b>A Nope.</b></p> <p>3 Q Why not?</p> <p>4 <b>A Because the only thing that was evaluated</b></p> <p>5 <b>that was a -- his vitals were perfect. He was</b></p> <p>6 <b>reporting a little bit of eating disturbance and</b></p> <p>7 <b>sleep issues. Other than that, he was stable. And</b></p> <p>8 <b>it's not unusual to have these scores.</b></p> <p>9 Q And on that same day, November 3rd, did you</p> <p>10 complete the initial health assessment for James</p> <p>11 Lynas?</p> <p>12 <b>A I would have to see the form. I believe</b></p> <p>13 <b>so.</b></p> <p>14 <b>Yes.</b></p> <p>15 <b>(Discussion held off the record.)</b></p> <p>16 BY MS. BENNETT:</p> <p>17 Q So Exhibit 19 is the health assessment you</p> <p>18 completed for James Lynas. Correct?</p> <p>19 <b>A Correct.</b></p> <p>20 Q And that's his initial health assessment?</p> <p>21 <b>A Correct.</b></p> <p>22 Q Why did that occur on November 3rd?</p> <p>23 <b>A I cannot give you a direct answer on that.</b></p> <p>24 <b>My guess would be because that I was seeing him also</b></p> <p>25 <b>for his chem assessment that day.</b></p>
<p style="text-align: right;">27</p> <p>1 <b>A A 7.</b></p> <p>2 Q Is it concerning to you that he reported</p> <p>3 only sleeping two hours?</p> <p>4 <b>A No.</b></p> <p>5 Q Why not?</p> <p>6 <b>A That's typical when people first get in</b></p> <p>7 <b>jail.</b></p> <p>8 Q And do you know what day he had arrived at</p> <p>9 the jail?</p> <p>10 <b>A Right now? No.</b></p> <p>11 Q And then do you have another note on that</p> <p>12 same exhibit?</p> <p>13 <b>A Yes.</b></p> <p>14 Q Can you walk us through that?</p> <p>15 <b>A Like --</b></p> <p>16 Q Can you read through it?</p> <p>17 <b>A Oh. Okay.</b></p> <p>18 <b>11/3. Patient reports that he did not</b></p> <p>19 <b>sleep very well because he had stomach pain. He</b></p> <p>20 <b>reports he has last -- his last bout of diarrhea was</b></p> <p>21 <b>last night after dinner. Patient denies any other</b></p> <p>22 <b>symptoms. Follow-up again tomorrow.</b></p> <p>23 Q And what score did you give him there?</p> <p>24 <b>A A 6.</b></p> <p>25 Q And was a medical provider contacted on</p>	<p style="text-align: right;">29</p> <p>1 Q Do you know that he arrived at Sherburne</p> <p>2 County on November 1st?</p> <p>3 <b>A Off the top of my head, no.</b></p> <p>4 Q Do you know that he was a transfer from</p> <p>5 Anoka?</p> <p>6 <b>A It says on his health assessment form.</b></p> <p>7 Q In your writing?</p> <p>8 <b>A Yep.</b></p> <p>9 Q So you knew that at the time?</p> <p>10 <b>A Yes.</b></p> <p>11 Q And, typically, these wouldn't be done</p> <p>12 prior to 14 days into the inmate's stay. Right?</p> <p>13 <b>A They can be done at any time between the</b></p> <p>14 <b>first and 14th day. We have until day 14 to do them.</b></p> <p>15 Q Okay. So any time between day -- the start</p> <p>16 date and day 14 is acceptable to complete the initial</p> <p>17 health assessment?</p> <p>18 <b>A Correct.</b></p> <p>19 Q On the second page of Exhibit 19, you note</p> <p>20 that he had a mental health diagnosis. Correct?</p> <p>21 <b>A Correct.</b></p> <p>22 Q Of depression and anxiety?</p> <p>23 <b>A Correct.</b></p> <p>24 Q And also ADD?</p> <p>25 <b>A Correct.</b></p>

<p style="text-align: right;">30</p> <p>1 Q And that he had suicidal ideation?</p> <p>2 <b>A Yes.</b></p> <p>3 Q And you note, "Yes. Last night when</p> <p>4 stomach hurt?"</p> <p>5 <b>A Correct.</b></p> <p>6 Q And when you checked "yes" for suicidal</p> <p>7 ideation, did you mean that he had that continuing</p> <p>8 ideation?</p> <p>9 <b>A No.</b></p> <p>10 Q How would we know that?</p> <p>11 <b>A "Had thoughts of self-harm."</b></p> <p>12 <b>Because it's in my note at the bottom of</b></p> <p>13 <b>the page. "Patient denies any thoughts of self-harm</b></p> <p>14 <b>now."</b></p> <p>15 Q So he was just having thoughts of self-harm</p> <p>16 the night before?</p> <p>17 <b>A Correct. Because his stomach hurt.</b></p> <p>18 Q And that he had -- you also noted that he</p> <p>19 had a history of chemical dependency?</p> <p>20 <b>A Correct.</b></p> <p>21 Q And heroin use?</p> <p>22 <b>A Correct.</b></p> <p>23 Q And then in the nursing assessment there's</p> <p>24 a handwritten note by you, that you were just</p> <p>25 referring to, and it explains more about the burning</p>	<p style="text-align: right;">32</p> <p>1 care, you as an RN with MEnD would make sure that</p> <p>2 that occurred. Right?</p> <p>3 <b>A Correct.</b></p> <p>4 Q And then it goes on, your note, nursing</p> <p>5 assessment note goes on to say, "Reviewed above with</p> <p>6 mental health," and then it continues. Can you read</p> <p>7 that portion or do you know what it is that you</p> <p>8 wrote?</p> <p>9 <b>A "Reviewed above with mental health. Follow</b></p> <p>10 <b>up in the clinic as needed."</b></p> <p>11 Q And then your signature?</p> <p>12 <b>A Yes.</b></p> <p>13 Q And who did you review this with from</p> <p>14 mental health?</p> <p>15 <b>A Michael Roberts. Robertson.</b></p> <p>16 Q How do you know that you did that with him?</p> <p>17 <b>A He was our only mental health provider at</b></p> <p>18 <b>the time.</b></p> <p>19 Q So just by way of him being the only one,</p> <p>20 it had to have been him? Or do you have a --</p> <p>21 <b>A Correct.</b></p> <p>22 Q -- specific recollection?</p> <p>23 <b>A I don't have a specific recollection.</b></p> <p>24 Q And there's nothing written down that it</p> <p>25 was specifically him. Correct?</p>
<p style="text-align: right;">31</p> <p>1 feeling in his stomach, and then that pain from last</p> <p>2 night caused him to have the thoughts of self-harm.</p> <p>3 Right?</p> <p>4 <b>A Correct.</b></p> <p>5 Q And then it says, "Patient started on</p> <p>6 mental health process."</p> <p>7 <b>A Correct.</b></p> <p>8 Q What does that mean?</p> <p>9 <b>A They -- it's a two-process thing for mental</b></p> <p>10 <b>health. We give them the Beck Depression Inventory,</b></p> <p>11 <b>and we explain how they are to fill it out. And then</b></p> <p>12 <b>we are -- we explain the second step that they will</b></p> <p>13 <b>get once they have completed the Beck Depression</b></p> <p>14 <b>Inventory and have turned it in.</b></p> <p>15 Q And was that your decision, to give him the</p> <p>16 Beck Depression Inventory?</p> <p>17 <b>A I asked him if he would want to start the</b></p> <p>18 <b>mental health process.</b></p> <p>19 Q So it's the inmate's decision to start the</p> <p>20 mental health process?</p> <p>21 <b>A Correct.</b></p> <p>22 Q Why?</p> <p>23 <b>A Because it's their medical care. It's up</b></p> <p>24 <b>to them. They have a right to refuse care.</b></p> <p>25 Q If someone is in need of urgent medical</p>	<p style="text-align: right;">33</p> <p>1 <b>A Correct.</b></p> <p>2 Q Do you know if he appears in any of James</p> <p>3 Lynas' records?</p> <p>4 <b>A No. I do not.</b></p> <p>5 Q And who is the -- so then, again, you</p> <p>6 signed your nursing assessment. Correct? At the</p> <p>7 narrative portion?</p> <p>8 <b>A Correct.</b></p> <p>9 Q And then you, again, signed for the nurse,</p> <p>10 print and signature, and dated it 11/3/17. Right?</p> <p>11 <b>A Correct.</b></p> <p>12 Q And then someone else signed in the medical</p> <p>13 provider signature?</p> <p>14 <b>A Correct.</b></p> <p>15 Q And that's dated, I believe, 11/6?</p> <p>16 <b>A Correct.</b></p> <p>17 Q Whose signature is that?</p> <p>18 <b>A I believe it's Janell Mehlhoff's. Or</b></p> <p>19 <b>Janell Hussein, now.</b></p> <p>20 Q Are you sure on that?</p> <p>21 <b>A Not 100 percent. But that would be my</b></p> <p>22 <b>guess.</b></p> <p>23 Q Do you know if she ever saw James Lynas?</p> <p>24 <b>A No. I do not know.</b></p> <p>25 Q Or does she typically just review your or</p>

<p style="text-align: right;">34</p> <p>1 the RN's health assessment and sign off on it?</p> <p>2 <b>A She typically reviews and signs off.</b></p> <p>3 <b>(Sotto voce communication between</b></p> <p>4 <b>plaintiff's counsel.)</b></p> <p>5 BY MS. BENNETT:</p> <p>6 Q Showing you Exhibit 13. And there's a few</p> <p>7 emails within this. I just have to find...</p> <p>8 The email from Michael Robertson, sent on</p> <p>9 Monday, December 10, 2018, to Diana VanDerBeek. Do</p> <p>10 you see that?</p> <p>11 <b>A Yes.</b></p> <p>12 Q And then it -- the subject is, "Brian Frank</p> <p>13 called 4:15 wanting to get background on two patients</p> <p>14 today."</p> <p>15 Did I read that right?</p> <p>16 <b>A Yes.</b></p> <p>17 Q And if you flip to the next page. 12101,</p> <p>18 which from other emails in this same exhibit --</p> <p>19 MR. BENNETT: No, no. 12 -- you read it</p> <p>20 wrong.</p> <p>21 BY MS. BENNETT:</p> <p>22 Q 12101. Sorry.</p> <p>23 Do you see that?</p> <p>24 <b>A Yes.</b></p> <p>25 Q And we've been told that that's James Lynas</p>	<p style="text-align: right;">36</p> <p>1 James Lynas's suicide risk screening form. And you</p> <p>2 filled out one for him. Correct?</p> <p>3 <b>A Correct.</b></p> <p>4 Q And what date did that occur on?</p> <p>5 <b>A It appears that it's on the 6th. However,</b></p> <p>6 <b>I don't believe I saw him on the 6th.</b></p> <p>7 Q So why would the date say the 6th if you</p> <p>8 never saw him then?</p> <p>9 <b>A Error.</b></p> <p>10 Q And it looks like it was actually kind of</p> <p>11 drawn over to be turned into the 6th. Do you agree</p> <p>12 with that?</p> <p>13 <b>A Correct.</b></p> <p>14 Q Do you know what day it was originally</p> <p>15 written?</p> <p>16 <b>A 11/3.</b></p> <p>17 Q And is that the date you actually saw him?</p> <p>18 <b>A Yes.</b></p> <p>19 Q So why was it changed to be a later day?</p> <p>20 <b>A I don't know.</b></p> <p>21 Q When was that change made?</p> <p>22 <b>A I don't know.</b></p> <p>23 Q Did you make that change?</p> <p>24 <b>A Not that I know of.</b></p> <p>25 Q So someone else altered a form that you in</p>
<p style="text-align: right;">35</p> <p>1 and his inmate number. And it's -- do you know that</p> <p>2 to be true?</p> <p>3 <b>A I'd have to see his booking sheet.</b></p> <p>4 Q I think even on your health assessment it's</p> <p>5 the same number.</p> <p>6 Is that right?</p> <p>7 <b>A Yes.</b></p> <p>8 Q And it says: Regarding dates of 11/5/17,</p> <p>9 it was not a case I was ever involved in, but relayed</p> <p>10 that patient was placed on mental health watch 15 --</p> <p>11 or MHW15 -- due to high BDI and risk factors when</p> <p>12 nursing met with him about this and consulted with</p> <p>13 medical provider.</p> <p>14 Do you see that?</p> <p>15 <b>A Yes.</b></p> <p>16 Q And that's, again, Michael Robertson, his</p> <p>17 signature block at the end of this email. Right?</p> <p>18 <b>A Yes.</b></p> <p>19 Q So it appears he was never involved with</p> <p>20 James Lynas. Is that what that email means?</p> <p>21 <b>A That's what he's saying.</b></p> <p>22 <b>(Sotto voce communication between</b></p> <p>23 <b>plaintiff's counsel.)</b></p> <p>24 BY MS. BENNETT:</p> <p>25 Q Showing you Exhibit 20, which -- back to</p>	<p style="text-align: right;">37</p> <p>1 fact had done on November 3rd?</p> <p>2 MS. NEARING: Objection. Misstating the</p> <p>3 testimony.</p> <p>4 <b>A Possibly.</b></p> <p>5 BY MS. BENNETT:</p> <p>6 Q Well, if it wasn't you and it's changed,</p> <p>7 would that lead you to believe that someone else did</p> <p>8 it?</p> <p>9 <b>A I don't remember changing it.</b></p> <p>10 Q And you checked that the indication for</p> <p>11 this screening was "abnormal health assessment</p> <p>12 screen," which is what you performed and we just went</p> <p>13 through on the -- on November 3rd. Right?</p> <p>14 <b>A Correct.</b></p> <p>15 Q And you noted that he had no specific time?</p> <p>16 Or no time specified. Sorry. Is that correct?</p> <p>17 <b>A Correct.</b></p> <p>18 Q Does that mean he had a plan but didn't</p> <p>19 have a time?</p> <p>20 <b>A No.</b></p> <p>21 Q What does that mean, to you?</p> <p>22 <b>A When I read, I read every single one of</b></p> <p>23 <b>these to them and ask them which one best describes</b></p> <p>24 <b>them. And that is what he chose.</b></p> <p>25 Q Did you ask any follow-up questions as to</p>

<p style="text-align: right;">38</p> <p>1 what that meant to him?</p> <p>2 <b>A No, I did not.</b></p> <p>3 Q Did you do any follow-up questions with</p> <p>4 regard to any of the circles on this sheet?</p> <p>5 <b>A Just asked him if he wanted to do the</b></p> <p>6 <b>mental health process.</b></p> <p>7 Q And he apparently said yes? And you did,</p> <p>8 in fact, started him on that process?</p> <p>9 <b>A Correct.</b></p> <p>10 Q Do you know when he finished the Beck</p> <p>11 Depression Inventory?</p> <p>12 <b>A I do not.</b></p> <p>13 Q Did you give James Lynas any medication</p> <p>14 during his stay at the jail in November of 2017?</p> <p>15 <b>A Maalox.</b></p> <p>16 Q And why were -- why did you give him that?</p> <p>17 <b>A For his stomach.</b></p> <p>18 Q And that was part of his withdrawal</p> <p>19 symptoms?</p> <p>20 <b>A Or his upset stomach.</b></p> <p>21 Q You just don't know which -- what the cause</p> <p>22 behind his stomach being upset was?</p> <p>23 <b>A Correct.</b></p> <p>24 Q Do you know if Dr. Leonard ever saw James</p> <p>25 Lynas?</p>	<p style="text-align: right;">40</p> <p>1 <b>with.</b></p> <p>2 Q But as you sit here today, you don't have</p> <p>3 any specific recollection of actually doing that?</p> <p>4 <b>A No. It was two years ago.</b></p> <p>5 Q And, in fact, his email says it didn't</p> <p>6 happen. Right?</p> <p>7 <b>A Apparently.</b></p> <p>8 Q Did you talk to any correctional officers</p> <p>9 regarding James Lynas after he committed suicide?</p> <p>10 <b>A No.</b></p> <p>11 Q Did you talk to anyone about him committing</p> <p>12 suicide?</p> <p>13 <b>A No.</b></p> <p>14 Q Did you attend a debriefing regarding the</p> <p>15 suicide?</p> <p>16 <b>A Yes.</b></p> <p>17 Q Were there two?</p> <p>18 <b>A I believe so.</b></p> <p>19 Q Did you attend both?</p> <p>20 <b>A No.</b></p> <p>21 Q Which one did you attend?</p> <p>22 <b>A The one that was held on a Sunday. I don't</b></p> <p>23 <b>know what they called it.</b></p> <p>24 Q And who led that debriefing?</p> <p>25 <b>A Two outside individuals.</b></p>
<p style="text-align: right;">39</p> <p>1 <b>A I do not know.</b></p> <p>2 Q Did you have any conversations with</p> <p>3 Dr. Leonard regarding James Lynas?</p> <p>4 <b>A Just that I was being sued.</b></p> <p>5 Q When did you talk to him?</p> <p>6 <b>A The day after I got served.</b></p> <p>7 Q So you talked to him about being sued, but</p> <p>8 not about the inmate who committed suicide at the</p> <p>9 jail?</p> <p>10 <b>A Correct.</b></p> <p>11 Q Do you know if Crystal Waagmeester ever saw</p> <p>12 James Lynas?</p> <p>13 <b>A Not that I know of. Because she's not,</b></p> <p>14 <b>typically, a provider at our facility.</b></p> <p>15 Q Did you talk to her at all?</p> <p>16 <b>A No.</b></p> <p>17 Q Do you know her?</p> <p>18 <b>A No.</b></p> <p>19 Q And I believe you stated this, but just to</p> <p>20 be clear: You don't have any recollection, as you</p> <p>21 sit here today, talking specifically to Michael</p> <p>22 Robertson regarding James Lynas?</p> <p>23 <b>A It's common practice to review certain</b></p> <p>24 <b>things with the mental health provider, so that would</b></p> <p>25 <b>have -- he would have been the one that I reviewed it</b></p>	<p style="text-align: right;">41</p> <p>1 Q And how was that offered to you or made</p> <p>2 available to you?</p> <p>3 <b>A Through the jail.</b></p> <p>4 Q Who else was present at the debriefing that</p> <p>5 you attended?</p> <p>6 <b>A Alyssa and Linda Stang.</b></p> <p>7 Q Are those the only individuals that you</p> <p>8 recall being there?</p> <p>9 <b>A Those were the only individuals, besides</b></p> <p>10 <b>the two head people.</b></p> <p>11 Q So three people from Sherburne County, --</p> <p>12 <b>A Correct.</b></p> <p>13 Q -- the jail, attended the debriefing that</p> <p>14 you were at?</p> <p>15 <b>A Correct.</b></p> <p>16 Q Do you know if anyone else went to the</p> <p>17 other debriefings?</p> <p>18 <b>A I have no idea.</b></p> <p>19 MS. BENNETT: Did you ever -- I have no</p> <p>20 further questions.</p> <p>21 (Sotto voce communication between</p> <p>22 plaintiff's counsel.)</p> <p>23 BY MS. BENNETT:</p> <p>24 Q Is serious depression a serious medical</p> <p>25 need?</p>

<p style="text-align: right;">42</p> <p>1       <b>A Yes.</b></p> <p>2       Q And is a score of 43 on the Beck Depression</p> <p>3       Inventory severe depression?</p> <p>4       MS. NEARING: Objection. Foundation.</p> <p>5       <b>A Yes.</b></p> <p>6       BY MS. BENNETT:</p> <p>7       Q Have you scored Beck Depression Inventories</p> <p>8       during your time with MEnD?</p> <p>9       <b>A Yes.</b></p> <p>10      Q Did you use Beck Depression Inventories</p> <p>11      as -- as a Sherburne County --</p> <p>12      <b>A No.</b></p> <p>13      Q Is -- and is the scale for Beck Depression</p> <p>14      Inventory scoring available to you at the jail?</p> <p>15      <b>A Say that again. Ask me that again.</b></p> <p>16      Q Is the scoring scale for the Beck</p> <p>17      Depression Inventory --</p> <p>18      <b>A Oh.</b></p> <p>19      Q -- available to you?</p> <p>20      <b>A Yes.</b></p> <p>21      Q So you know the different categories and</p> <p>22      what the scores mean --</p> <p>23      <b>A Yes.</b></p> <p>24      Q -- through that scale?</p> <p>25      MS. BENNETT: That's all the questions I</p>	<p style="text-align: right;">44</p> <p>1       deposition. It is 12:14 p.m.</p> <p>2       (The video deposition of JENNIE THOMPSON was</p> <p>3       concluded at 12:14 p.m.)</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">43</p> <p>1       have.</p> <p>2       MR. HIVELEY: No questions.</p> <p>3       MS. NEARING: I have a question.</p> <p>4       EXAMINATION</p> <p>5       BY MS. NEARING:</p> <p>6       Q I want to clarify something.</p> <p>7       The Exhibit 20, which is the suicide risk</p> <p>8       screening form and the assessment that you did with</p> <p>9       the date that is unclear. Can we correlate this to</p> <p>10      being done on the date that you saw Mr. Lynas on</p> <p>11      November 3rd?</p> <p>12      <b>A Yes.</b></p> <p>13      Q And how can we do that?</p> <p>14      <b>A The score is in the box.</b></p> <p>15      Q And what are you -- are you referring</p> <p>16      to a --</p> <p>17      <b>A The score in Exhibit 19, right next to the</b></p> <p>18      <b>mental health diagnosis, suicide ideation, past</b></p> <p>19      <b>suicide, there's a box and the score is 16, which is</b></p> <p>20      <b>exactly the same score that he got on the suicide</b></p> <p>21      <b>risk form.</b></p> <p>22      MS. NEARING: Okay. Thank you.</p> <p>23      All right. We'll read and sign.</p> <p>24      MR. BENNETT: Thanks.</p> <p>25      VIDEOGRAPHER: This concludes the</p>	<p style="text-align: right;">45</p> <p>1</p> <p>2       REPORTER'S CERTIFICATE</p> <p>3</p> <p>4       I, Jane T. Doby, Registered Merit Reporter, a</p> <p>5       Notary Public in and for the County of Hennepin,</p> <p>6       State of Minnesota, certify that the foregoing is</p> <p>7       a true record of the testimony given by JENNIE</p> <p>8       THOMPSON, who was first duly sworn by me, having been</p> <p>9       taken on May 30, 2019, at Caribou Coffee, St. Cloud</p> <p>10      West, 4135 West Division Street, St. Cloud, Minnesota,</p> <p>11      in my presence and reduced to writing in accordance</p> <p>12      with my stenographic and computerized notes made at</p> <p>13      said time and place;</p> <p>14</p> <p>15      I further certify that I am not a</p> <p>16      relative or employee or attorney or counsel of any</p> <p>17      of the parties or a relative or employee of such</p> <p>18      attorney or counsel;</p> <p>19      That I am not financially interested in</p> <p>20      the action and have no contract with the parties,</p> <p>21      attorneys, or persons with an interest in the</p> <p>22      action that affects or has a substantial tendency</p> <p>23      to affect my impartiality;</p> <p>24      That the cost of the original has been</p> <p>25      charged to the party who noticed the deposition,</p> <p>        and that all parties who ordered copies have been</p> <p>        charged at the same rate for such copies;</p> <p>        That the witness DID request an opportunity to</p> <p>        review the transcript.</p> <p>        WITNESS MY HAND AND SEAL this 5th day of</p> <p>        June, 2019.</p> <p>        </p> <p>        Jane T. Doby         Registered Merit Reporter         Notary Public         Hennepin County, Minnesota</p> <p>        </p>

<p>1                    E R R A T A   S H E E T</p> <p>2                    I, JENNIE THOMPSON, certify that I have read</p> <p>3                    and examined the typewritten transcript of the</p> <p>4                    deposition taken of me in the matter of David W. Lynas,</p> <p>5                    Trustee for the next-of-kin of James C. Lynas vs. LINDA</p> <p>6                    S. STANG, ET AL., on May 30, 2019, consisting of the</p> <p>7                    preceding pages, and find the same to be true and</p> <p>8                    correct.</p> <p>9                    (Except as follows):</p> <p>10                    Reason</p> <table border="1"><thead><tr><th>Page</th><th>Line</th><th>Correction</th><th>for Change</th></tr></thead><tbody><tr><td>11</td><td>_____</td><td>_____</td><td>_____</td></tr><tr><td>12</td><td>_____</td><td>_____</td><td>_____</td></tr><tr><td>13</td><td>_____</td><td>_____</td><td>_____</td></tr><tr><td>14</td><td>_____</td><td>_____</td><td>_____</td></tr><tr><td>15</td><td>_____</td><td>_____</td><td>_____</td></tr><tr><td>16</td><td>_____</td><td>_____</td><td>_____</td></tr><tr><td>17</td><td>_____</td><td>_____</td><td>_____</td></tr><tr><td>18</td><td>_____</td><td>_____</td><td>_____</td></tr><tr><td>19</td><td>_____</td><td>_____</td><td>_____</td></tr><tr><td>20</td><td>_____</td><td>_____</td><td>_____</td></tr><tr><td>21</td><td>_____</td><td>_____</td><td>_____</td></tr><tr><td>22</td><td>_____</td><td>_____</td><td>_____</td></tr><tr><td>23</td><td colspan="3">Dated this _____ day of _____</td></tr><tr><td>24</td><td colspan="3">_____</td></tr><tr><td>25</td><td colspan="3">JENNIE THOMPSON</td></tr></tbody></table>	Page	Line	Correction	for Change	11	_____	_____	_____	12	_____	_____	_____	13	_____	_____	_____	14	_____	_____	_____	15	_____	_____	_____	16	_____	_____	_____	17	_____	_____	_____	18	_____	_____	_____	19	_____	_____	_____	20	_____	_____	_____	21	_____	_____	_____	22	_____	_____	_____	23	Dated this _____ day of _____			24	_____			25	JENNIE THOMPSON			<p>46</p>
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